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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

PHOEUN PHANG,)	
)	2:20-cv-00586-WBS-DMC
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER FOR AN
ANDREW SAUL,)	EXTENSION OF TIME
Commissioner of Social Security,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have a 31-day extension of time from November 13, 2020 to December 14, 2020 to respond to Plaintiff's motion for summary judgment. Defendant's counsel needs additional time to review the record and draft the responsive brief. Since Plaintiff filed the opening brief, Defendant's counsel has completed several briefs and held trainings for the office's new attorneys. Defendant's counsel apologizes to the Court and Plaintiff for this delay.

This request is made in good faith with no intention to unduly delay the proceedings.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

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4 Respectfully submitted,

5 Dated: November 11, 2020

/s/ Jacqueline A. Forslund by Chantal R. Jenkins*

6 *As authorized via email on November 11, 2020

Jacqueline Anna Forslund

7 Attorney for Plaintiff

8
9 Dated: November 11, 2020

McGREGOR W. SCOTT

10 United States Attorney

DEBORAH LEE STACHEL

11 Regional Chief Counsel, Region IX

12 Social Security Administration

13 By: /s/ Chantal R. Jenkins

14 CHANTAL R. JENKINS

15 Special Assistant United States Attorney

16
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18 ORDER

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20 APPROVED AND SO ORDERED:

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22 Dated: November 17, 2020

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24 DENNIS M. COTA

25 UNITED STATES MAGISTRATE JUDGE